

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

IN RE: CONGREGATION OF UNITY, INC.)	CASE #16-10069
)	
Debtors)	
)	CHAPTER 11
)	
)	
)	

**MOTION TO RECONSIDER
ORDER DISMISSING CASE**

COMES NOWS Congregation of Unity, Inc. ("Debtor") by and through their attorney, R. Kelly Calloway, Jr. and respectfully shows the Court the following:

1. On March 1, 2016, Debtor filed a petition with the Bankruptcy Court for the Western District of North Carolina under Chapter 11 of Title 11 of the United States Code.
2. A motion to Dismiss was filed by the Bankruptcy Administrator for failure to obtain Liability Insurance, which was continued to April 20, 2016.
3. Debtor failed to obtain insurance by the continued court date of April 20, 2016 Court date and an order of Dismissal was ordered by the Court on April 28, 2016.
4. The Debtor has since obtained the Liability Insurance and has not done any business on the premises since the filing of this case.

WHEREFORE, Debtor prays the Court as follows:

1. Reconsider the Order Dismissing the above referenced case.
2. Allow attorney fee for approximately 1.8 hours at a rate of \$250.00 per hour totaling \$450.00 for preparation of this motion, appearance and subsequent order.
3. Grant Debtor such other and further relief as may seem just and proper.
This the 26th day of April, 2016.

CALLOWAY & ASSOCIATES LAW FIRM, P.C.

s/ R. Kelly Calloway, Jr.

R. Kelly Calloway, Jr.
NC State Bar #19860
318 N. Main Street, Suite 9
Hendersonville, NC 28792
Telephone: (828)696-8660
Facsimile: (828)696-8683

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NOTICE OF HEARING

TAKE NOTICE that notice that the Debtor by and through her attorney, R. Kelly Calloway, Jr. has filed with the Court a **MOTION TO RECONSIDER ORDER DISMISSING CASE** and a hearing on said motion has been scheduled for **May 3, 2016 at 10:00 a.m.**

This the 29th day of April, 2016.

CALLOWAY & ASSOCIATES LAW FIRM, P.C.

s/ R. Kelly Calloway, Jr.

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CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing Response on all parties listed below, by depositing the same with the United States Postal Service in a properly addressed envelope to the last known address with adequate postage thereon, or by electronic process where marked*.

***Linda Simpson**
Bankruptcy Administrator
402 West Trade Street
Suite #200
Charlotte, NC 28202

Entegra Bank
PO Box 1559
Franklin, NC 28744

Entegra Bank
640 N Main St
Hendersonville, NC 28792

Henderson County Tax Collector
200 N. Grove Street, Suite 66
Hendersonville, NC 28792

Internal Revenue Service
P.O. Box 7317
Philadelphia, PA 19101-7346

Internal Revenue Service
ATTN: Insolvency Unit
2303 W Meadowview Rd Ste 200
Greensboro, NC 27407-3703

***Mark A. Pinkston**
Attorney for Entegra Bank
PO Box 7376
Asheville, NC 28802

North Carolina Department of Revenue
Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

North Carolina Department of Revenue
PO Drawer 25000
Raleigh, NC 27640-0640

U.S. Securities Exchange
Office of Reorganization
950 East Paces Ferry Road, N.E.
Suite 900
Atlanta, GA 30326-1382

This the 29th day of April, 2016.

CALLOWAY & ASSOCIATES LAW FIRM, P.C.

s/ R. Kelly Calloway, Jr.
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